

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

FIRST-CLASS MAIL AND PERIODICALS
SERVICE STANDARD CHANGES, 2021

Docket No. N2021-1

**UNITED STATES POSTAL SERVICE'S INTERROGATORIES AND REQUESTS FOR THE
PRODUCTION OF DOCUMENTS TO AMERICAN POSTAL
WORKERS UNION WITNESS MORRISON (USPS/APWU-RT1-1 TO -2)
(June 7, 2021)**

Pursuant to 39 C.F.R. § 3020.117(a) the United States Postal Service directs the following interrogatories and requests for the production of documents to the American Postal Workers Union, AFL-CIO witness Anita Morrison (USPS/APWU-RT1).

Respectfully submitted,

UNITED STATES POSTAL SERVICE
By its attorneys,

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USPS/APWU-RT1-1: Please refer to Exhibit F of your testimony at page 18 (“Demographic Characteristics of 3 Digit Zip Codes with the Highest Percent of First Class Mail Volume Delayed”), and

- a. Please provide the national average measures for each of the demographic characteristics cited and indicate which of the characteristics for each 3-digit ZIP Code in the table exhibit a difference of more than two percentage points from the national average.
- b. Please provide the source used for the demographic characteristics cited in Exhibit F and how it can be accessed or obtained. If it cannot be obtained publicly, please produce the source material used.

USPS/APWU-RT1-2: On page 6 of your testimony you state on lines 6-7, 14-15, and 21-22, that mail will suffer “delays” due to the new service standards and refer to “Volume Delayed” at Exhibit F on page 18. Please confirm that when you use the term “delay” you mean that an additional day or two days is being added to the service standard for First-Class Mail. If not confirmed, please explain.